IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	**:**	**CRIMINAL NO.** _____
v.	**:**	**DATE FILED:** _____
ANDRE LAMONT DANIELS	**:**	**VIOLATIONS:**
		21 U.S.C. § 843(a)(3) (acquiring a
	:	**controlled substance by fraud**
		- 14 counts)
	:	**18 U.S.C. § 2 (aiding and abetting)**

I N D I C T M E N T

COUNTS 1 THROUGH 14

THE GRAND JURY CHARGES THAT:

On or about the dates in the chart below, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANDRE LAMONT DANIELS

knowingly and intentionally acquired, and aided and abetted the acquisition of, oxycodone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, that is, defendant presented, or aided and abetted the presentation of, fraudulent prescriptions for oxycodone which were created without the knowledge or permission of the physician to whom the prescriptions were attributed and signed with forgeries of the physician's signature, with each acquisition constituting a separate count:

Count	Date	Location
1	June 16, 2009	Rite Aid Pharmacy, 7401 Ogontz Avenue
2	June 23, 2009	Shop-Rite Pharmacy, 2385 Cheltenham Avenue

Count	Date	Location
3	June 23, 2009	Walgreens Pharmacy, 4201 North Broad Street
4	June 25, 2009	77 Ogontz Pharmacy, 7624 Ogontz Avenue
5	June 25, 2009	Sav-On Pharmacy, 7010 Germantown Avenue
6	July 15, 2009	Rite Aid Pharmacy, 2131-59 North Broad Street
7	January 5, 2010	CVS Pharmacy, 7219 Ridge Avenue
8	January 5, 2010	Rite Aid Pharmacy, 7401 Ogontz Avenue
9	January 6, 2010	Walgreens Pharmacy, 300 North 63rd Street
10	January 8, 2010	77 Ogontz Pharmacy, 7624 Ogontz Avenue
11	January 8, 2010	Super Fresh Pharmacy, 7700 Crittenden Street
12	January 15, 2010	Shop-Rite Pharmacy, 6901 Ridge Avenue
13	January 21, 2010	Super Fresh Pharmacy, 7162 Ridge Avenue
14	January 21, 2010	VIVA Pharmacy, 171 West Lehigh Avenue

All in violation of Title 21, United States Code, Section 843(a)(3), and Title 18,

United States Code, Section 2.

A TRUE BILL:

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FOREPERSON

_____

ZANE DAVID MEMEGER
United States Attorney